



electronic
CHILD HEALTH NETWORK

Delta Privacy Impact Assessment Summary

**Ontario Laboratories Information System (OLIS)
Full Production Release (FPR)
Phase II – Expand Rollout to Licensed Health Care
Practitioners in Community Practice**

Date : October 26, 2016

Version : 1.0



Introduction

As required by the *Personal Health Information Protection Act, 2004* (“PHIPA”) and O. Reg. 329/04¹, eCHN completed a Privacy Impact Assessment (“PIA”) for Phase II of the integration between eCHN and eHealth Ontario for the Ontario Laboratories Information System (OLIS). The roll-out of Phase II for the eCHN-OLIS integration expanded the number eCHN users that access Ontario laboratories data via the WebChart application.

The following PIA Summary provides a brief overview of Phase II for the eCHN integration with OLIS and also outlines the general findings from the assessment.

Background

eCHN operates as a not-for-profit, government funded organization dedicated to providing electronic solutions that enable the secure sharing of personal health information² (“PHI”) between authorized health care providers. The eCHN production system assembles millions of records from paediatric patient interactions within the healthcare system in Ontario, for use in the delivery of clinical care.

eCHN receives paediatric data (from birth up to the nineteenth birthday), from contributing clients and assembles the data in the form of a single electronic health record. eCHN’s electronic health record consists of key areas of information such as: admission, discharge and transfer data; lab reports; clinical notes; medication administration reports; consultant’s letters and surgical notes; diagnostic images and reports. Patient information received from contributing hospitals is available to users through the eCHN WebChart application. WebChart is eCHN’s clinical viewer, which provides access to the eCHN managed paediatric electronic health record (EHR). WebChart is used to facilitate the sharing of paediatric patient data between health information custodian³ contributors and authorized health information custodian⁴ users.

OLIS is a program of the Ministry of Health and Long-Term Care (MOHLTC) and operated by eHealth Ontario. OLIS gathers and maintains patient laboratory data from hospitals, public and community laboratories for viewing by authorized health care practitioners. The OLIS repository contains highly sensitive PHI such as physician ordered tests for patients, as well as the results of those tests.

In 2011, eCHN undertook a project in collaboration with eHealth Ontario and the Ministry of Health and Long Term Care whereby paediatric patient laboratory data from OLIS was made available to 21 health care provider users of the eCHN Portal. The Limited Production Release (LPR) was conducted to assess the benefits of OLIS data accessibility through eCHN, while identifying any issues which may be

¹ O. Reg. 329/04 section 6(3)(5)ii

² PHIPA section 4(1)

³ PHIPA section 3(1) 1-4

⁴ Ibid.



encountered with the full roll-out of OLIS. After the success of the LPR, eHealth Ontario and eCHN agreed to make lab results from the OLIS repository, available to identified eCHN Portal users. This new initiative, or Full Production Release (FPR) of OLIS was proposed to launch in 3 different phases.

- Phase 1, involved enabling access to OLIS lab results for specified health care providers within organizations (such as hospitals and CCACs) currently under contract with eHealth Ontario.
- Phase 2, as examined in this Delta PIA, enables access to OLIS results for licensed health care providers in community practices that are under contract with eHealth Ontario.
- Phase 3 is proposed to launch in early 2017 and will enable access to non-licensed parties (e.g. admins, genetic counsellors and other support staff) working under the authority of health information custodian that was previously granted access in the above noted phases. Phase 3 is not within scope of this Delta PIA, but will be examined as part of a separate assessment, prior to its launch.

Summary of the Delta PIA for OLIS FPR Phase II

The October 26th, 2016 OLIS FPR Delta PIA for Phase II reviewed/updated the project data flows, the expansion of the eCHN role in user registration for access to OLIS data, the proposed access to community practice users along with any relevant changes to the functionality of the WebChart application and OLIS related queries.

The Delta PIA examination confirmed that eCHN continues to operate as a sub-agent of the Ministry of Health and Long-Term Care for the OLIS integration and access activities. eCHN core services for the WebChart application continue to be provided as a PHIPA Agent and a Health Information Network Provider, for health information custodian clients. No substantive changes were identified in the OLIS query process. Viewing availability was however expanded to a new group of authorized health information custodians and licensed health care providers within community practice locations.

Finally, the Delta PIA for Phase II of the FPR roll-out confirmed that all four recommendations from the Phase I FPR assessment were completed. See the [OLIS FPR Phase 1 PIA](#) for additional information on the initial OLIS FPR rollout, the risks and recommendations. Two new recommendations were identified in the Phase II Delta PIA, as summarized below:

1. eCHN should continue with plans to update the previously completed Threat and Risk Assessment (TRA) which was conducted with the release of the LPR for OLIS. A new TRA is scheduled to be completed in Spring 2017.
2. eCHN should consider development of a pop-up reminder and/or user training to inform all users that they must select the facility that they represent in respect of the patient they are treating. At present health care provider users may not be aware that they must change their



facility of authority, when treating patients from different organizations (e.g. private practice vs. hospital).

eCHN is scheduled to address both recommendations from the October 26th, 2016 Delta PIA for Phase II, by Spring 2017. eCHN will manage the ongoing status and tracking of the risks through a resulting risk treatment plan.

eCHN Privacy & Security Office Contact

If you have any additional questions about the October 26th, 2016 OLIS FPR Delta PIA for Phase II, please contact the eCHN Privacy & Security Office at privacy@echn.ca or 416-813-7998.